

JILL DILLARD vs CITY OF SPRINGDALE
SEEWALD, JESSA on 09/13/2021

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF ARKANSAS
3 FAYETTEVILLE DIVISION

4 JILL DILLARD, JESSA SEEWALD,)
5 JINGER VUOLO, and JOY DUGGAR,)
6 PLAINTIFFS,)
7 VS.)
8))
9 CITY OF SPRINGDALE, ARKANSAS;) CASE NO.
10 WASHINGTON COUNTY, ARKANSAS;) 17-CV-05089-TLB
11 KATHY O'KELLEY, in her Individual)
12 and Official Capacities; ERNEST)
13 CATE, in his Individual and)
14 Official Capacities; RICK HOYT,)
15 in his Individual and Official)
16 Capacities; STEVE ZEGA, in his)
17 Official Capacity;)
18 Does 1-10, Inclusive,)
19 DEFENDANTS.)

20 -----
21 ORAL AND VIDEOTAPED DEPOSITION OF

22 JESSA SEEWALD

23 September 13, 2021
24 -----

25 ORAL AND VIDEOTAPED DEPOSITION OF JESSA SEEWALD,
1 produced as a witness at the instance of the
2 DEFENDANTS, and duly sworn, was taken in the
3 above-styled and numbered cause on the 13th day of
4 September, 2021, from 10:03 a.m. to 2:57 p.m., before
5 Tammie L. Foreman, CCR in and for the State of
6 Arkansas, RPR, CRR, reported by machine shorthand, via
7 audio-video conference, pursuant to the Federal Rules
8 of Civil Procedure.

1 A. -- I suppose I could have been wrong.

2 Q. Sure. Do you recall when you googled the report

3 in May of 2015 and read it whether you remember seeing

4 your name appear in the report?

5 A. No, I did not see my name.

6 Q. Okay. Did you see any of your coplaintiffs'

7 names, Jill Dillard, Jinger Vuolo, Joy Duggar, or

8 their maiden names in the report?

9 A. No, sir. But there were five of us girls in the

10 household at the time, and four of us were victims.

11 So it didn't take much to deduce.

12 Q. Okay. You said at the time. At the time of

13 what?

14 A. At the time when the report would have been

15 written.

16 Q. Okay. Who was -- if -- if the four of you that

17 are plaintiffs in this lawsuit were the four victims,

18 who was the fifth daughter?

19 A. My sister Jana.

20 Q. Okay. And is it your understanding that she was

21 never molested by Josh?

22 A. She wasn't.

23 Q. Okay. What was your understanding, if you had

24 any, as to why the DHS worker came to your house that

25 day when you were somewhere between 10 and 14?

1 in that sense, but family business. My dad does real
2 estate, so we would help flip houses. Or he does a
3 lot of commercial real estate, too. And so some of my
4 sisters and I would help him with design. And we also
5 did a TV show for a while, so I guess that's kind of
6 work.

7 Q. Right.

8 A. And yeah.

9 Q. Some of your sisters do social media for income.
10 Have you ever done any of that?

11 A. Yes, sir. I do.

12 Q. What platforms are you on?

13 A. Instagram, Twitter, Facebook, and YouTube.

14 Q. And just ballpark, how much income did you bring
15 in through social media last year?

16 A. I'm not sure. Maybe -- if I were to guess,
17 maybe 30,000.

18 Q. Okay.

19 A. But it could be more or less.

20 Q. Sure. What is your husband's name?

21 A. Ben Seewald. Benjamin Seewald.

22 Q. What does he do?

23 A. He's a pastor.

24 Q. Oh, okay. What church?

25 A. Immanuel Baptist Church in Springdale.

1 way. Do you know one way or the other whether your
2 name was ever printed by any publication as a victim
3 of Josh's molestations prior to your interview on
4 Megyn Kelly's Show?

5 A. I don't believe so.

6 MR. BLEDSOE: Object to the form.

7 Q. Okay. On Megyn Kelly's show, you identified
8 yourself as one of Josh's victims, correct?

9 A. Yes, sir.

10 Q. Okay. And I believe you also spoke about the
11 molestation and the redacted disclosures and the
12 effects of all of that in the first few episodes of
13 the second TV show, right?

14 MR. BLEDSOE: Object to the form.

15 A. Yes.

16 Q. Okay. Other than the Megyn Kelly interview and
17 those first few episodes of the second TV show, have
18 you ever publically discussed or communicated in
19 writing about the molestation, the redacted
20 disclosures, or the effects of either or both of
21 those?

22 A. Not to my knowledge.

23 Q. Okay. I believe one of your sisters recently
24 released a book. Have you ever worked on a book or
25 pitched a book about your life?

1 A. My sisters and I wrote a book together.

2 Q. Yeah. What's the name of that book?

3 A. Growing up Duggar.

4 Q. When was that published?

5 A. Before any of us were married. I don't know
6 when that was. Maybe 2012. I don't know.

7 Q. And, of course, there was nothing about the
8 molestations in that book, correct?

9 A. No, sir.

10 Q. Okay. Did y'all have any discussion about
11 including accounts of the molestations in that book
12 Growing Up Duggar?

13 A. No.

14 Q. Who published the book?

15 A. I think Simon & Schuster maybe, but I'm not
16 sure.

17 Q. Who was your contact with the publisher?

18 A. We had a lady that was helping us. I don't
19 remember her name. Jill probably already told you
20 because she has a better memory about, like, the book
21 stuff, I think. But I don't -- I don't remember her
22 name.

23 Q. Let me use a term, you let me know if you're
24 unfamiliar with it. Did y'all have a ghostwriter?

25 A. We did have, yeah. Our contact was, like, a

1 totally different.

2 Q. Okay. Were you on this trip to Central America
3 where the bodyguard was murdered?

4 A. I don't -- I don't believe so.

5 Q. Okay.

6 A. I did know that man, I believe. But I don't
7 think -- I wasn't on that trip.

8 Q. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 A. [REDACTED]

12 Q. In that interview, you said that your marriage
13 was great. Everything was going great in your
14 marriage. Does that remain correct?

15 A. Yes, sir. I have a wonderful marriage.

16 Q. I honestly felt guilty after reading all of
17 y'all's descriptions of your marriages. I had to go
18 home and buy flowers for my wife. I've been married
19 21 years.

20 A. Oh.

21 Q. You've got to keep it going.

22 A. Yes, sir. That's part of life.

23 Q. [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]
2 A. [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 Q. [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 A. [REDACTED]
10 Q. [REDACTED]
11 A. [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 Q. [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 A. [REDACTED]
20 Q. Bad question. Let me withdraw and ask it a
21 different way. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

JILL DILLARD vs CITY OF SPRINGDALE

SEEWALD, JESSA on 09/13/2021

1 Q. In your perspective, what would have been better
2 for your parents to have done than what they did?

3 MR. BLEDSOE: Object to the form.

4 A. I don't know. I mean, I -- I -- yeah. I don't
5 know.

6 Q. Have they ever said to you that they wish they
7 had done anything in particular differently?

8 A. No. No. Just they think that they probably
9 could have done better.

10 Q. You never blamed yourself for anything, have
11 you, in relation to your molestations?

12 A. No. No.

13 Q. [REDACTED]

14 [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 MR. BLEDSOE: Object to the form.

19 A. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]

2 A. [REDACTED]

3 Q. At the time of these redacted disclosures, you
4 were married, correct?

5 A. Yes.

6 Q. Where were you living at that time?

7 A. Same place that I live right now.

8 Q. In Springdale? I'm sorry.

9 A. Fayetteville.

10 Q. You told me Fayetteville. And your parents were
11 living in what town?

12 A. Springdale.

13 Q. Okay. After these redacted disclosures were
14 published, did you move back in with your parents?

15 A. No.

16 Q. Did you go to stay at their house overnight?

17 A. Maybe.

18 Q. There was some testimony -- I am going to
19 represent to you there was some testimony in earlier
20 depositions about the family retreating to another
21 location for a month or so. Do you recall that?

22 A. Yes, sir. Yeah. They left town.

23 Q. Yeah. Did you go out there with them?

24 A. I didn't stay out there. I think I visited them
25 a time or two.

1 sisters?

2 MR. BLEDSOE: Object to the form.

3 A. No.

4 Q. Why not?

5 MR. BLEDSOE: Object to the form.

6 A. I just don't.

7 Q. Okay. Other than today, obviously, when you're
8 being asked questions about a lawsuit related to this,
9 how often do you think about your molestation by Josh
10 or these redacted police disclosures and publications
11 that followed?

12 MR. BLEDSOE: Object to the form.

13 A. Not constantly. It is something I do think
14 about from time to time.

15 Q. Okay. Once or twice a year?

16 MR. BLEDSOE: Object to the form.

17 A. I don't know. I mean, we're still in this
18 lawsuit. So in some ways, it's something that's --
19 like, there's not been closure yet. So I guess in
20 that sense, I do probably think about it more.

21 Q. So this lawsuit is preventing you from achieving
22 closure?

23 MR. BLEDSOE: Object to the form.

24 A. No.

25 Q. Okay. Is there anything that you are unable to

1 do in your day-to-day life because of the disclosures
2 six years ago?

3 MR. BLEDSOE: Object to the form.

4 A. What do you mean? Like, I can't go to the
5 grocery store or something? Like --

6 Q. Yeah. Does the fact of those disclosures six
7 years ago, a little more than six years ago now,
8 prevent you from functioning in any way in your
9 day-to-day life?

10 MR. BLEDSOE: Object to the form.

11 A. There's -- there's ongoing shame I feel like
12 over -- over that. And, like, I still will face
13 negative stuff, like, say on my social media and stuff
14 like that from time to time. People still bring that
15 up. Like, I still face that. But it's not like I
16 can't go to the grocery store or take my kids to the
17 park.

18 Q. The negative stuff on social media, do you feel
19 like that's directed toward you or to Josh?

20 A. Both. Sometimes it's more him, but sometimes
21 it's, like "the whole family is a bunch of sickos"
22 kind of stuff. Like, we're all in it together.
23 People lump us all together.

24 Q. Okay. As we sit here today, do you believe the
25 general public knows the identity of the non-family

1 left. Why don't we take our lunch break
2 now, if that's okay with everybody.

3 Tom, you want to chime in on timing?
4 What did you say?

5 MR. KIEKLAK: 1:15 is fine.

6 MR. OWENS: Would that be okay with
7 everybody?

8 MR. BLEDSOE: Fine with me.

9 MR. OWENS: We'll take a lunch break now
10 and resume at 1:15. Thank you.

11 THE WITNESS: All right.

12 THE VIDEOGRAPHER: The time is 12:18.

13 We are now off the record.

14 (Recess from 12:18 p.m. to 1:15 p.m.)

15 THE VIDEOGRAPHER: The time is 1:15. We
16 are now on the record.

17 Q. Hi, Ms. Seewald. We are back on the record.
18 Let me ask you, have you -- how long were you on a
19 reality TV show?

20 A. Maybe -- my family was filmed for about 17
21 years. The reality show wasn't quite that long.
22 Maybe -- maybe 15 years.

23 Q. During that TV show, the run of that TV show,
24 particularly the first television show, did you find
25 yourself being recognized in public?

1 A. Like, 19 Kids & Counting, you're saying, or,
2 like, those ones?

3 Q. 19 Kids & Counting, the first TV show.

4 A. Yeah. Yeah.

5 Q. Did you make appearances based on your status as
6 a public figure?

7 A. We would sometimes, like, go to different
8 churches and do things, like, my parents would give a
9 talk or stuff like that.

10 Q. Did anybody ever stop you to take a selfie?

11 A. Yeah.

12 Q. Anybody ever ask you for your autograph?

13 A. Uh-huh.

14 Q. Is that a yes?

15 A. Yes, sir.

16 Q. How frequently would those kind of things happen
17 when you were out in public? Pretty much every time
18 you went out or --

19 A. Yeah. A lot. I mean, like, even if people
20 didn't stop me, I could see them taking pictures on
21 their phone and stuff like that.

22 Q. Right. Okay. What private fact, if any, do you
23 think the separate Washington County defendants,
24 Washington County or Rick Hoyt, disclosed about you
25 publically?

1 attributable to each and every member of the immediate
2 family?

3 A. I think so.

4 Q. Okay. You allege in this case that you were
5 emotionally distressed and mentally anguished,
6 correct?

7 A. Yes.

8 Q. Any -- have you been harmed in any other way as
9 a result of the redacted disclosures in this case?

10 MR. BLEDSOE: Object to the form.

11 A. What do you mean?

12 Q. Other than -- yeah. I mean, other than
13 emotional distress or mental anguish, have you been
14 harmed in any other way?

15 MR. BLEDSOE: Object to the form.

16 A. I don't know.

17 Q. Okay. You have told me that you did not see
18 your name in any of the redacted disclosures. Did you
19 see any other information that would publically
20 disclose your identity?

21 MR. BLEDSOE: Object to the form.

22 A. I haven't reread that recently, so I don't know.

23 Q. Okay. You would describe yourself as not a
24 particularly emotional person, wouldn't you?

25 MR. BLEDSOE: Object to the form.

1 you had that same sort of feeling, or were you more
2 reluctant to do that second show?

3 A. No, I wasn't reluctant. I was on board with it.

4 Q. Okay. And so you enjoyed that in the same way
5 you think?

6 A. Uh-huh. I mean, getting through the first few
7 shows is probably awkward because just the content.
8 But, like, overall, it was just focus on family and
9 our kids and our life, and so that was fun.

10 Q. When you were on the show as a -- when you still
11 lived in your parents' house, the Counting On show --
12 I mean, the And Counting show, who made the most
13 decisions as far as, you know, about what would get
14 filmed, who would be filmed, and who would be in the
15 show?

16 A. We all would. We would come up with different
17 ideas and things we'd do, and talk back and forth
18 with, like, our producers and stuff.

19 Q. And did you feel like anyone had sort of the
20 final say, or was the person who made, like, in the
21 end of the process the decisions?

22 A. Well, if I thought an idea was dumb, I was not
23 afraid to speak my mind. I'd be like, "That's dumb.
24 I'm not doing that."

25 Q. So each of you could sort of decide on your own

1 know, when TLC found out, you know, and the first show
2 ended up being canceled. Do you -- do you ever recall
3 a time when you felt like "I want to be careful. I
4 want to keep this secret on the show at least," not
5 necessarily with my mom or my sisters. But we're not
6 going to -- we can't let this part of our life on the
7 show? Did you ever feel pressure about that?

8 A. I didn't really think about that because it
9 wasn't something we thought much about or talked about
10 within our family. It was something that kind of
11 happened in the past and, I mean, a few friends maybe
12 knew, but we didn't really have, like, a -- like, we
13 didn't even really think about that becoming, like,
14 public knowledge.

15 Q. Okay. And do you recall the situation when you
16 guys went up to Chicago to be on Oprah?

17 A. Sort of.

18 Q. Well, tell me what you remember about that, if
19 anything.

20 A. We filmed an Oprah, but they didn't air it.

21 Q. Do you remember why?

22 A. Yes. Somebody, like, told them something about
23 the situation, and that's why they didn't air it.
24 That's what I heard.

25 Q. So to be clear, the situation would be the

1 with, like, a spinoff show if they were wanting to do
2 that. Like, yeah. I didn't feel, like, pressured.
3 Like, I was happy to do it if they were up for that.

4 Q. Do you recall anyone ever saying to you, "We
5 really hope you will do that. You know, we really are
6 counting on you to do that"?

7 A. No.

8 Q. May we talk about social media for a second? I
9 think you've testified about certain social media
10 accounts. I think those are -- I won't make you say
11 it again, but tell me if I'm wrong. Instagram,
12 YouTube, Facebook, and Twitter?

13 A. Uh-huh.

14 Q. Would you mind, if you can remember, how many
15 Facebook accounts do you have?

16 A. One.

17 Q. And what do you call that one? What's your
18 handle?

19 A. Jessa Seewald.

20 Q. And how about YouTube? How many YouTube
21 accounts or --

22 A. One.

23 Q. Just one? What is that one called?

24 A. Jessa Seewald.

25 Q. And Facebook?

1 A. Jessa Seewald.

2 Q. And so just the one?

3 A. Yeah.

4 Q. Okay. And same with Twitter?

5 A. Yeah.

6 Q. Just one? Do you share those with your husband
7 or does he have separate ones besides --

8 A. He has his own. He doesn't do YouTube. But
9 yeah, he has Twitter. Ben Seewald on Twitter.

10 Ben Seewald on Instagram. And Ben Seewald on Facebook
11 page.

12 Q. Okay. And then he also posts, I think, to the
13 church Facebook as well?

14 A. I think somebody else runs that for him.

15 Q. Okay. Do you use any other kind of app besides
16 your, kind of, iPhone texting to communicate? Do you
17 use any kind of a instant messenger or Slack or
18 anything like that besides just texting?

19 A. No.

20 Q. Okay.

21 A. Just texting.

22 Q. Okay. Social media, you mentioned that you made
23 money last year. You do make money during the year
24 doing social media work. When I say social media
25 partnerships, that's kind of what I mean. Like you're

1 partnering with a product, an agency, something like
2 that. So that's what I'm going to use. And I just
3 want to ask you if you enjoy doing that work, if you
4 enjoy the social media partnerships.

5 A. Yeah.

6 Q. What do you do, Ms. Seewald, to sort of foster
7 or grow that business?

8 A. Not much. I mean, yeah. We have people that
9 will contact us and want us to promote their brand or
10 their product, I guess.

11 Q. Okay. When you say you have people, are those
12 people that you have a contract with, are contracted
13 to work with?

14 A. I don't actually, like, contact people or, like,
15 they don't contact me directly. They go through -- I
16 worked through Central Entertainment Group for a
17 little while, and then I worked through the Gift Shop
18 for a little while.

19 Q. Are you still with the Gift Shop?

20 A. Yes, sir.

21 Q. Okay. And so they're the ones that bring you
22 ideas, if you want to do this or not sort of thing?

23 A. Yes.

24 Q. Okay. So you mentioned you don't do much to
25 foster or grow that. Could you do more if you could,

1 if you could do it and work into the time that you
2 have available for it?

3 A. Well, I just -- people have reached out to the
4 agents and, like, they'll send me stuff. And it's
5 been -- yeah. It's been, like, plenty of stuff, like,
6 I don't feel like I need to go looking for anything.

7 Q. Okay.

8 A. I'm a busy mom, too.

9 Q. Right. Right. You said four, right?

10 A. Yes.

11 Q. What is it -- what is the Gift Shop looking for
12 from you to continue to want to bring you products?
13 Are they looking for activity on your social media
14 accounts by way of, you know, followers or hits or
15 views, or is there something else they're looking for
16 when they want to work with you, as far as you know,
17 as far as you understand?

18 A. They don't run any of my social media or
19 anything like that. So I just post, like, whatever
20 regular stuff, and all they do is they just -- people
21 contact them if they're interested in, like,
22 advertising with us. So I don't know what -- how they
23 judge all that or whatever.

24 I mean, I guess I've got kids, so maybe
25 people might be sending me, like, kid clothes products

1 or things like that that they're interested in me
2 promoting. Like, kid family stuff. Like, it's
3 probably just like whatever my daily life kind of
4 looks like, they -- I don't know how I am with that.

5 Q. Would you do more -- would you do more
6 television if you could? If the offer came along to
7 do reality TV, would you do that?

8 A. Not right now.

9 Q. Why not?

10 A. I'm busy.

11 Q. You're so --

12 A. Life is busy right now. I mean, I've got, yeah,
13 four young kids and all that.

14 Q. Okay. So this is a little bit of a rhetorical
15 question, but who in the world could be busier than
16 your mom when she was doing the show, right? So --

17 A. It's not that I couldn't. It's just that, like,
18 do I have desire. I guess I don't really -- I'm not
19 looking to turn around and, like, do it all over again
20 right now.

21 Q. Okay. Do you have that planned in the future?
22 Like, at a certain point, we might be open to that
23 again, or is that just not something --

24 A. I'm not planning on it for any period of time,
25 but I'm not saying that I wouldn't ever either. Like,

1 about the system of beliefs in the religion that you
2 guys follow? By you guys, I don't want to lump all of
3 you together because I know that there's a difference
4 between you and your sisters. But just you and your
5 family, your immediate family.

6 MR. BLEDSOE: Object to the form.

7 A. Not especially, I don't feel like.

8 Q. Okay.

9 A. I mean, we're Christians, but there's a lot of
10 Christians in this country. Yeah.

11 Q. Going back to 2014, prior to the release of the
12 information, do you recall that your mom made what
13 were called robo calls, calls that contacted people
14 about an ordinance in Fayetteville, a civil rights
15 ordinance in Fayetteville? Do you remember that?

16 A. Uh-huh.

17 Q. Okay. What do you recall about it?

18 A. Just what you said. She recorded that robo
19 call.

20 Q. Okay. Do you remember any of it? Did she
21 receive any positive attention for that?

22 MR. BLEDSOE: Object to the form.

23 A. No. I don't really remember.

24 Q. Or negative attention for that?

25 A. I mean, I guess it probably depends on what side

1 the name before, I don't know who that is. I couldn't
2 tell you.

3 Q. Well, I was going to ask about the other two
4 people who are individuals who you guys sued, and
5 that's Ernest Cate and Kathy O'Kelley. Do you know --
6 would you know Ernest Cate if he walked down the
7 street right now?

8 A. No.

9 Q. Have you ever met him before?

10 A. I don't think so, but I don't know.

11 Q. Okay. How about Kathy O'Kelley, do you know
12 her?

13 A. As far as I know.

14 Q. How do you know her?

15 A. No. I don't -- I don't think I know her. I
16 don't know if -- my dad has been in politics for a
17 long time, so I could have met someone at an event one
18 time. You know, like, I don't know.

19 Q. That's fair. So they're both sued. Do you sort
20 of -- sitting there right now, do you have an idea of
21 what you think, just you think, Ernest Cate did?

22 A. If I knew who the person was in their capacity,
23 then I might know by their title rather than just
24 their name. I don't know.

25 Q. Okay. How about Kathy O'Kelley?

1 A. The police chief?

2 Q. Yes, ma'am. She's the former police chief.

3 A. Yeah. I'm not the most knowledgeable person in
4 this case, but yeah. I think she had a friendship
5 with one of the ladies at the law firm. Like, she put
6 In Touch in contact with the law firm in Little Rock
7 to contact them for the FOIA or something like that.

8 Q. So you've -- at least what you've been told or
9 what you've learned is Kathy O'Kelley contacted
10 In Touch and put them in touch with a law firm in
11 Little Rock?

12 MR. BLEDSOE: Jessa, I am going to
13 object to the form. Tell you not to expose
14 attorney/client --

15 THE COURT REPORTER: I'm sorry.

16 Q. Hey, don't tell me what your lawyer told you.
17 Never tell me that.

18 MR. BLEDSOE: I'm still talking. Do you
19 mind?

20 Q. I should have said at the beginning. One thing
21 I never want to know is what Mr. Bledsoe or any other
22 of the attorneys -- and if I ask a question that you
23 go, "Well, I remember Mr. Bledsoe," don't tell me
24 that.

25 A. No. That wasn't something I heard from the

1 lawyer. That's something that I read on the e-mail
2 and then something that my dad told me --

3 Q. Okay.

4 A. -- that he had heard, so...

5 Q. Well, from what you've read or your dad told
6 you, anything else, do you have any -- do you believe
7 that she was trying to hurt you guys personally, or
8 you personally?

9 A. I guess that remains to be seen, I mean, with
10 the evidence. I don't know.

11 Q. But do you have a belief about that?

12 A. I don't know. I mean, I guess that's what we're
13 trying to prove or disprove, right?

14 Q. Do you know of any evidence of that?

15 A. No. I suppose you'd want to just check her
16 e-mails and check her texts and see if there's any
17 truth to that. I don't know.

18 Q. Okay.

19 A. I hope she didn't destroy any evidence, just
20 like you hope we didn't. I don't know.

21 Q. Okay. Do you think she did destroy anything?

22 A. No, I'm not saying she did. I'm just saying,
23 like, if you don't have all the texts or all the
24 interactions or you don't know all the friendships,
25 then there's always possibilities, right? Like, maybe

1 big news break.

2 Q. Did you tell anyone that that's what you wanted
3 to do, you wanted to make a response on television?

4 A. Yeah. I mean, I -- I was up for it.

5 Q. Was it your idea to do that?

6 A. I mean, I was fine to, like, speak out. Yeah.
7 Like, they -- I think we were trying to discuss, like,
8 you know, will we say something? Will we respond?
9 Will we just be quiet? And I was like, "I'll say
10 something." Like, I'll say something.

11 Q. Okay. What do you recall receiving ahead of the
12 actual interview to get you prepared?

13 A. I don't remember. I think we probably got
14 together and talked about, like, how are we going to
15 do it or something. I mean, I'm sure we talked about
16 it beforehand. I don't think I would just walk in and
17 sit on the set kind of thing. I think we probably had
18 a conversation about it.

19 Q. Do you remember Chad Gallagher being very
20 involved in that process?

21 A. I mean, I'm pretty sure he was there. He was --
22 he's been with us through thick and thin, so I'm
23 pretty sure he was part of it.

24 Q. Do you remember Chad Gallagher actually sending
25 you information about the very specific scope of the

1 interview, even questions and answers?

2 A. No. I don't -- he may have sent us, like, a
3 overview of, like, what the interview might be
4 touching on but not, like, answers. I mean, answers
5 are your own. So...

6 Q. Okay. In the interview, you said, "Josh is not
7 a child molester, a pedophile, or a rapist. That is
8 so overboard and a lie really." Is that still your
9 position? Do you still believe that?

10 MR. BLEDSOE: Object to the form.

11 A. Can -- can you repeat that again?

12 Q. I sure can. It says, "Josh is not a child
13 molester, a pedophile, or a rapist. That's so
14 overboard and a lie." I wonder if that's still your
15 position today, knowing what you know now?

16 MR. BLEDSOE: Object to the form.

17 A. I would say at that time that I was looking at
18 him as who he was in that season of life. Like, I
19 wouldn't view him that way. As far as, like, his
20 current case, like, I think I'm not going to make a
21 judgment call on that because it's not been decided
22 yet.

23 Q. So with regard to that statement, you're not
24 sure what you believe yet at this point?

25 A. Well, no.